

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

V.

KENNETH BRISSETTE and
TIMOTHY SULLIVAN

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)
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) Case No. 16-cr-10137-LTS
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**MOTION TO CONTINUE TRIAL DATE BY ONE WEEK
TO ACCOMMODATE WITNESS SCHEDULE**

Defendants Kenneth Brissette and Timothy Sullivan move this Court to continue the start of the trial in this matter by one week, from July 15, 2019 to July 22, 2019.

As grounds for this Motion, the defendants state that trial is currently set to commence on Monday, July 15, 2019, and is anticipated to last approximately two weeks. The date of July 15, 2019 was originally requested by the defendants because they anticipated it would accommodate the witnesses' schedules. Recently, however, the defendants learned that one of the witnesses identified by both parties – former Boston Police Commissioner William Evans (“Chief Evans”) – will be out of the country on business for the U.S. State Department from Sunday, July 14, 2019 to Thursday, July 25, 2019, essentially the entire length of the trial as presently scheduled.

Chief Evans is a critical witness for the defense because he played an important role concerning the alcohol license issued to Crash Line in September 2014. Chief Evans is a percipient witness to the issuance of Crash Line's license, and his testimony is critical to the defense. A brief one-week continuance of the start of trial will allow Chief Evans to complete his work travel and still be available to testify in this matter.

For the foregoing reasons, the defendants respectfully request that the start date for the trial in this matter be continued by one week, from July 15, 2019 to July 22, 2019.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Undersigned counsel certifies that the parties have conferred on this Motion.

Respectfully submitted,

KENNETH BRISSETTE,
By his attorneys,

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/s/ Sara E. Silva

/s/ Courtney Caruso

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